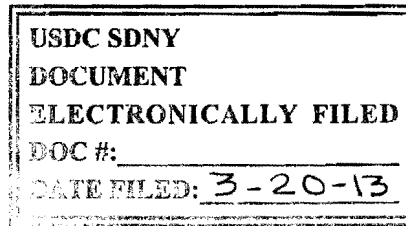


MEMO ENDORSED**SEYFARTH**
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March 19, 2013

VIA EMAIL

United States District Judge Andrew L. Carter, Jr.
Thurgood Marshall United States Courthouse
Foley Square, 40 Centre Street
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: ***G Investors Holding LLC v. Lincoln Benefit Life Company***
(USDC, SDNY, No. 09-cv-02980)

Dear Judge Carter:

This firm represents Lincoln Benefit Life Company ("Lincoln") in the action referenced above. We write in response to the letter sent earlier this afternoon by Plaintiff's counsel in connection with Lincoln's status report letter (the "Report") that was submitted to the Court on Friday, March 15.

We need not address counsel's self-serving claim that the Report violated Your Honor's instructions at the close of trial, except to note that the Court requested a status report from Lincoln by close of business on March 15, which report was timely provided. The Report advised the Court that LBL is considering its post-verdict options, including making a motion pursuant to Rules 50(b) and 59 of the Federal Rules of Civil Procedure. Lincoln will not be bullied by counsel's meritless threat of sanctions, into making a significant litigation decision in haste. Lincoln is carefully considering all of its options available under the Federal Rules of Civil Procedure and will advise the Court as soon as it reaches a decision as to which of its post verdict options it will pursue.

Finally, Lincoln respectfully requests a conference with the Court to discuss Plaintiff's proposed Final Order After Trial By Jury which was submitted to the Court today. Plaintiff's proposed Final Order is inconsistent with prior Court Orders with respect to unpaid premiums that are currently in escrow, and is also objectionable in other respects.

Defendant should file written objections to Plaintiff's proposed final order in a letter brief by 3/29/13. Plaintiff should reply by 4/5/13. Status Conference set for 4/19/13 at 4:00p.m. So Ordered.

cc: Derek M. Zisser, Esq. (Via Email)
Dennis D'Antonio, Esq. (Via Email)

Respectfully submitted,

SEYFARTH SHAW LLP

Elizabeth D. Schrero

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THIS LETTERHEAD IS PRINTED ON RECYCLED STOCK

3-20-13

ATLANTA BOSTON CHICAGO HOUSTON LOS ANGELES NEW YORK SACRAMENTO SAN FRANCISCO WASHINGTON, D.C. LONDON